

EXHIBIT

11

**THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

Civil Action No. 1:14-CV-00954-LCB-JLW

STUDENTS FOR FAIR ADMISSIONS,
INC.,

Plaintiff,

v.

UNIVERSITY OF NORTH CAROLINA,
et al.,

Defendants,

And

ANDREW BRENNEN; LUIS ACOSTA;
CHRISTOPHER JACKSON on behalf of
C.J.; RAMONIA JONES on behalf of R.J.;
JULIA NIEVES on behalf of I.N.; ANGIE &
KEVIN MILLS on behalf of Q.M.; LAURA
ORNELAS; CECILIA POLANCO;
TAMIKA WILLIAMS on behalf of A.J.;
and STAR WINGATE-BEY,

Defendant-Intervenors.

**DECLARATION OF
PATSY B. ZEIGLER**

Patsy B. Zeigler, pursuant to 28 U.S.C. § 1746, declares the following:

1. My name is Patsy B. Zeigler, I am over 18 years of age, and I am fully competent to make this declaration.

2. I was a full-time undergraduate student at UNC-Chapel Hill during the period of 1979 - 1983. While at UNC, my major was Industrial Relations and I had a concentration in Sociology. I obtained an MBA from Pfeiffer University in 2000.

3. I am an American of African Descent.
4. My mother attended a four year college. My father was deceased; he had been an entrepreneur. I graduated Valedictorian from high school and was awarded a full scholarship to UNC from the NC Veterans Association.
5. I attended North Carolina's Governor's School – East and many of my GSE's friends were Carolina bound, and yes, they were African Americans. The University of North Carolina – Chapel Hill is the only school to which I applied. For me it was Carolina or bust. Factors that fueled my desire to be a Tar Heel included the academic reputation of the university, the highly intelligent and gifted friends I made at GSE who would also attend, the idea of attending NC's flag ship school, my mother's insistence that I remain in North Carolina for my college experience, plus the push by my teachers and counselor for me to attend UNC.
6. Upon entering UNC, the minority students arrived early and participated in a Pre-O (orientation) program. This program was designed to bring incoming freshmen together to get acquainted and to bond while getting acclimated to the campus. Pre-O showed us that we were not alone and that we brought diversity to campus though it would be much different once the general student body arrived, as the minority representation would be miniscule in the larger scheme and our numbers would diminish greatly.
7. Upper classmen were our Orientation Counselors and they, more than anything else, gave us inspiration and proved that we belonged and could survive as minority students breaking barriers at UNC. The mission was to introduce us to programs and services that would be helpful to successfully navigating student life. Pre-O was an extraordinary experience and I made many life-long friends who helped to guide me and encourage me along the way. I returned in my sophomore year as a Pre-O Counselor because I knew the value of the program and I wanted to do my part to continue the tradition of welcoming minority freshmen and helping them get a solid start at UNC.
8. The friendships I made with other Carolina students have continued after graduation and many professional relationships have developed and fostered over the years. My primary care physician, gynecologist, optometrist, dentist, realtor, attorney and many of my other professional resources are Tar Heels, many are African American, but not all. The networking circles are tremendous. I learned early in my working career that being a UNC alumnus would prove to be valuable and highly respected. Programs like Pre O were not the only special programs the university offered. I also became aware of UNC's other targeted programs through the Community College system and the Honors College among others to help develop young minds.

9. Although it has been more than three decades since I graduated, there are a few memories that are embedded and I will share a couple here. I took French for my foreign language. The professor was a young professional who was married with a toddler. One day the professor asked me to stay after class. She asked me to be a babysitter for her daughter. I was the only African American female student in this class. I was struggling in French and I thought that if I did not babysit for her that my grade would suffer and I could possibly be penalized. Unaware of my rights and lacking in confidence I did not believe that I had an option. My professor paid me for my time but it was odd that she saw me as a domestic.

10. My second recollection also concerns me being treated as a domestic, this time by my white peers on campus. The dormitory I lived in was Cobb, on north campus. Cobb housed 400 girls out of which less than 10 were African American. There was a laundry room in the basement. The white girls who barely spoke to me on campus, would often ask me for help to do their laundry or would outright ask me to do that chore for them. I remember being told that their maid did their laundry while growing up and that the only Black people they knew personally were their maids. Naturally they saw me easily fitting into that role and it did not matter that I too was a student.

11. Diversity was essential not only for the African American students while I attended Carolina but also for the general student population. My being a student allowed many others to seek me out to be the answerer of their many questions regarding race. Many were curious and some even found the behavior of others crude and disrespectful. Living in Cobb taught me how to interact and thrive with the white co-eds and other students as well. These lessons have proved to be valuable in the workplace throughout the years not only for me but for us all.

12. Given our very small numbers at UNC, I felt very underrepresented as a student of color in the general college classes and also in the classes for my major. A particular example occurred in my junior year. I was ill at the beginning of the spring semester and had to miss a few classes. I remember feeling stressed wondering who I would be able to get notes from when finally healthy enough to attend class. There was only one other African American student in the class besides myself. I did not know him at the time, yet he was most helpful with providing notes and tutoring me to bring me up to speed. We remain friends to this day. This was a third year level Economics class. Having that one other African American student in my class was essential to my survival.

13. The racial climate was tense when I attended UNC. In order for the minority students to survive the experience and graduate, we had to rely on each other. We took advantage of the Black Student Movement and created or participated in many

organizations and groups that were geared towards the minority population within the larger setting.

14. Those who attended during my years are forever thankful to Dean Hayden Renwick for the recruiting of minority students and for the programs he administered to ensure our success. His door was always open to discuss classes, majors, schedules, internships and more. There were student advisors and tutoring. His office and staff also organized the Pre O program that I referenced earlier. It was beneficial to have Dean Renwick because for me, I did not trust that others in the administration were there to offer support on my behalf. In fact, it was my belief that they were not in full support of minorities attending UNC and would use any weakness I had as proof that I did not belong.

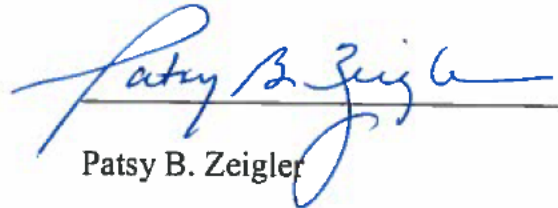
15. As history has shown, minorities have a way of creating their own survival methods. The minority community in Chapel Hill always showed support to the minorities students by welcoming us in their businesses and also at their churches.

16. I am a life member of the UNC General Alumni Association (GAA) and I return to campus for the annual Black Alumni Reunion (BAR). BAR is an opportunity to reunite with many who attended UNC with me as well as others who attended through the years. It is especially wonderful to meet the alums from the 60s and 70s who faced so much adversity at the university. We get to honor them and encourage more of the recent graduates to stay involved with the university.

17. Let me also share that both my daughters are also graduates of UNC. Undoubtedly I worked diligently with both as they applied, matriculated and became graduates in 2014 and 2016. They both had several options for college having been accepted into top colleges and universities around the country. They ultimately chose Carolina for its academic and athletic reputations as well as UNC being the best value.

18. Granted, attending the University of North Carolina is an honor and a privilege. Getting in is not easy, nor is graduating. Representation of all the state's population among the student body should be a given. UNC is meant to be the university of the people. It is therefore incredible and disheartening that the acceptance rate of minority students at UNC has not substantially improved since my tenure. In fact, it seems that there are less black male students at UNC today than when I attended back in 1979-83. If true, that should be considered a terrible step backwards.

I declare under penalty of perjury that the foregoing is true and correct. Executed
this 30th day of May, 2017.



Patsy B. Zeigler